

 BLANQUERNA <small>UNIVERSITAT RAMON LLULL</small>	CODE OF CONDUCT	Version:	1.0
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Review and Approval:

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1. PURPOSE OF THE CODE OF CONDUCT

The purpose of this Code of Conduct (hereinafter, the "Code") of the Blanquerna Foundation (hereinafter "Blanquerna," the "Institution," or the "Foundation"), approved by the Board of Trustees, is to establish the principles of action and best practices that should guide the behavior of the Foundation and all individuals working within it.

Additionally, the Code aims to provide a clear regulatory framework for the prevention of behaviors that may entail criminal liability for the Foundation. Corporate criminal liability was introduced in Spain with the 2010 reform of the Criminal Code and further developed in Organic Law 1/2015. This reform encourages legal entities to adopt crime prevention measures, including the establishment of a Code of Conduct that demonstrates the Institution's and its members' commitment to preventing irregular behaviors.

This Code of Conduct does not replace the Ramon Llull University Code of Ethics, which outlines the duties and commitments of the entire university community. Both documents coexist in parallel and complement each other.

2. SCOPE OF APPLICATION AND RECIPIENTS

This Code is applicable and mandatory for the entire Institution and binds the members of the Board of Trustees, directors, teaching and research staff (PDI), and administrative and service staff (PAS), regardless of their position or role.

Similarly, the Foundation will encourage students, users, and suppliers to align their behavior with guidelines similar to those defined in this Code.

3. COMMITMENT OF THE FOUNDATION

The Foundation commits to strictly complying with the laws, regulations, and standards applicable to its activities, with the aim of preventing, identifying, and mitigating any behavior that may result in legal liability.

All members of the Institution must act with the utmost integrity and professional ethics.

The Foundation commits to managing financial, material, and human resources transparently and to promoting an inclusive and diverse environment free from discrimination and harassment. In this regard, Blanquerna has established ***Protocols to ensure a workplace free from sexual and workplace harassment***, which regulate the actions and procedures to prevent, detect, manage, and sanction such behaviors within the Institution.

Given the specificities of the activities carried out by each group within the Institution and the relationships among them, the principles and values that should guide their actions are based on the commitments outlined below:

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- **Governing Body and Management Staff:**

- Their actions will be guided by transparency, impartiality, and non-discrimination, maintaining a conduct of respect and dignity toward the entire university community.
- They will ensure compliance with the principles of transparency, merit, suitability, and capability in recruitment processes.
- They will use dialogue, reasoning, and critical thinking in decision-making and conflict resolution, promoting the necessary channels for this purpose.
- They will establish the necessary resources to ensure communication and transparency in the organization's information.

- **Institution Staff: Teaching and Research Staff (PDI) and Administrative and Service Staff (PAS):**

- They will act with loyalty and good faith in the performance of their professional duties.
- They will promote and contribute to the development of effective, innovative, and high-quality teaching methodologies, with a commitment to the continuous improvement of teaching processes, management activities, and collaboration.
- They will foster a climate of trust and collaboration.
- They will demonstrate adaptability to change.
- They will participate in initiatives and activities organized by the programs in which they collaborate.

- **Relationship with Suppliers:**

- The supplier selection process will be conducted based on criteria of transparency, impartiality, objectivity, and efficiency, while adhering to the behavioral standards of this Code of Conduct.

- **Relationship with Authorities and Public Administration:**

- Actions will be guided by the principles of transparency and cooperation.

- **Relationship with Students:**

- Any inappropriate academic conduct will be avoided.
- They will act with loyalty and good faith in the performance of their professional duties, avoiding any conflicts of interest or situations that could harm the Blanquerna Foundation.

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- Communications with students must be strictly for academic purposes and conducted respectfully, avoiding any irregular behaviors outlined in the Sexual Harassment Protocol and this Code of Conduct.
- Romantic or sexual relationships between Administrative and Service Staff (PAS) or Teaching and Research Staff (PDI) and students are considered professional malpractice. These relationships exhibit a clear asymmetry, as PAS and PDI hold a position of authority over students. This consideration applies solely to relationships between staff and students and does not extend to relationships that may be established between PAS or PDI members.

4. INTERPRETATION OF THE CODE OF CONDUCT

The interpretation of this Code falls under the responsibility of the Regulatory Compliance Committee.

The interpretive criteria of this body are binding for all individuals who are part of the Institution.

In case of any doubt regarding the interpretation of this Code, individuals within the Institution must consult the Regulatory Compliance Committee.

5. BASIC PRINCIPLES OF BEHAVIOR

5.1. Respect for Legality

Members of the Board of Trustees, directors, teaching and research staff (PDI), and administrative and service staff (PAS) commit to carrying out their activities in accordance with current legislation, maintaining ethical behavior in all actions, and knowing and complying with the commitments and behavioral guidelines set forth in this Code.

Similarly, if they are summoned as suspects or accused in a criminal proceeding related to the Institution's activities, they must immediately inform the Regulatory Compliance Committee of this fact.

5.2. Respect for the Dignity of Individuals in the Workplace

Blanquerna rejects any form of physical, psychological, moral, or authority-based abuse. Any conduct that may create a threatening, intimidating, offensive, or hostile environment with respect to individuals' rights is prohibited.

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The Foundation's employees will be treated fairly and respectfully, fostering a healthy and safe work environment.

It is Blanquerna's intention to prevent behaviors that violate the dignity, equality, and sexual freedom of workers, students, and third parties, and to avoid any discrimination based on gender, color, age, religion, political or union affiliation, sexual orientation, race, culture, education, marital status, or nationality, as well as any other degrading behavior, hate speech, or glorification, in accordance with the provisions of the Criminal Code.

5.3. Health and Safety Policies

Blanquerna dedicates the necessary resources to provide its professionals and students with a healthy and safe environment.

The Institution will promote the adoption of ***occupational safety and health policies*** and implement the preventive measures established by legislation to minimize workplace risks for both its own staff and subcontracted personnel.

The Foundation is committed to assessing risks to the safety and health of workers, reviewing these assessments when working conditions change, and adopting the necessary measures.

All individuals within the Institution must strictly comply with occupational health and safety regulations and ensure their own safety and that of those affected by their activities.

Working under the influence of drugs and/or alcohol is prohibited.

5.4. Respect for Workers' Rights

Blanquerna will not hire minors or foreign citizens without work permits, will not use forced labor, and will not impose working conditions that violate current legislation.

All individuals working at the Foundation have the right to strike and to freedom of association.

The Institution will ensure equal opportunities for all employees in the development of their professional careers. All decisions related to the promotion and selection of workers or candidates will be evaluated objectively, considering objective criteria such as training, personal and professional merits, and the requirements necessary for each position.

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5.5. Protection of the Right to Privacy and Confidentiality of Communications

Blanquerna will respect the right to privacy in the use of digital devices in the workplace, the use of video surveillance and sound recording devices at the workplace, and the use of geolocation systems in the work environment, as stipulated by current Personal Data Protection regulations.

In accordance with *Personal Data Protection* regulations, access to content derived from the use of digital resources provided to workers will only be permitted for the purpose of monitoring compliance with labor or statutory obligations and ensuring the integrity of these devices. To this end, criteria for the use of digital devices will be established, always respecting the minimum standards for protecting privacy in accordance with social practices and legal rights. Likewise, the Institution will respect the right to digital disconnection.

Blanquerna will ensure that any controls established over the use of IT resources are the most appropriate, proportionate, and necessary to achieve the intended purpose, such as ensuring that the resources provided by the Institution to management and employees are used strictly for productive purposes without any expectation of privacy.

To this end, criteria for the use of digital devices will be established, always respecting the minimum standards for protecting privacy in accordance with social practices and legal rights. Internal regulations approved by the Institution in this regard must be adhered to.

5.6. Respect for the Image and Reputation of the Institution

The image and reputation of Blanquerna are essential assets for maintaining the trust of its students, employees, suppliers, and society in general.

Members of the Board of Trustees, directors, teaching and research staff (PDI), and administrative and service staff (PAS) must exercise particular care in any public intervention and must inform the Institution when acting on behalf of the Foundation in the media, social networks, professional events, or any other public activities that may gain public exposure.

Blanquerna must always maintain respectful, professional, accurate, and truthful communications, complying with regulations and based on the core principles of transparency and objectivity.

5.7. Loyalty to the Institution and Conflict of Interest

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The relationship between Blanquerna and the members of the Board of Trustees, directors, PDI, and PAS must be based on the principle of loyalty to the Institution.

Members of the Board of Trustees, directors, PDI, PAS, and individuals professionally or personally connected to them must prioritize only the interests of the Foundation in all business decisions or operations and, therefore, refrain from engaging in any private or personal interest activities that may involve or appear to involve conflicts of interest. Individuals considered personally or professionally connected are those defined in Article 312-9 of the Catalan Civil Code.

For the purposes of the above, a conflict of interest arises when a personal benefit or interest influences the professional decisions made by members of the Board of Trustees, directors, PDI, or PAS, and this personal benefit or interest may conflict with the interests of the Foundation.

They must not personally take advantage of any business opportunity belonging to the Institution or of which they became aware during their work at Blanquerna, even after their employment relationship with the Foundation has ended, unless expressly authorized by the governing body.

In case of doubt, the Regulatory Compliance Committee must be immediately informed.

5.8. Protection of Personal Data

Blanquerna will respect the right to privacy by protecting the personal data entrusted by its employees, students, researchers, suppliers, companies, and collaborating entities, complying with the provisions of current legislation, such as the Institution's approved *privacy and security policy*.

5.9. Handling of Information and Confidentiality

Members of the Board of Trustees, directors, PDI, and PAS commit to communicating both internal and external information in a truthful, reliable, and understandable manner and ensuring that the information entered into the Institution's files and IT systems is rigorous, reliable, accurate, and complete.

Non-public information is considered reserved and confidential, particularly information related to services provided, commercial activities, and strategy. Members of the Board of Trustees, directors, PDI, and PAS who have access to this information have a duty to preserve its confidentiality. In certain cases, as stipulated in their employment contract, this duty of confidentiality will persist even after their relationship with the Institution has ended.

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In case of doubt about the nature of the information, individuals within the Institution must treat it as confidential and consult the Regulatory Compliance Committee.

All information and knowledge generated within the scope of the Foundation is the property of the Foundation, as regulated by current legislation. In all cases, the ***internal regulations approved by the Institution regarding the handling of information and confidentiality*** must be respected.

5.10. Respect for Industrial and Intellectual Property

Blanquerna's industrial and intellectual property includes invention patents, utility models, trademarks, and trade names that distinguish the Institution's products or services in the market, design rights, works (literary, scientific, artistic, etc.), software, websites, among others.

Members of the Board of Trustees, directors, teaching and research staff (PDI), and administrative and service staff (PAS) must not allow third parties to use the Institution's intellectual property without proper authorization and a licensing agreement, nor permit defamatory or offensive use of it. Additionally, they commit to respecting the intellectual and industrial property of others (patents, utility models, and trademarks) by obtaining the necessary licenses or authorizations from their owners before use.

It is also necessary to comply with the ***internal regulations on industrial and intellectual property established*** by the Institution.

5.11. Use of Information Technology Systems

The equipment, IT systems, communication systems, and corporate network provided by Blanquerna to its directors and employees are the property of the Institution and must be used exclusively for professional purposes in a responsible manner. These are not suitable for activities or communications related to personal privacy or for damaging or harming third-party IT systems.

Specifically, Blanquerna's equipment, IT systems, communication systems, and corporate network must not be used to store, distribute, or access websites with content that violates fundamental rights to privacy, honor, personal image, or religious freedom; or that undermines human dignity due to racist, xenophobic content, glorification of violence or terrorism, or pornographic or sexist material.

The equipment, IT systems, communication systems, and corporate network provided by Blanquerna to its directors and employees must not be used to express personal opinions or access forums or social media, except with express consent for such purposes, nor for sending or participating in mass email distributions, message chains,

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jokes, or inappropriate images. It is also prohibited to send threatening, offensive, or defamatory emails or those that could harm the Foundation's image.

The *internal regulations on the use of information and communication technologies (ICT)* approved by the Foundation must be adhered to.

5.12. Use and Protection of Blanquerna's and Third Parties' Assets and Resources

Blanquerna provides the members of the Board of Trustees, directors, PDI, and PAS with the necessary resources to carry out their professional activities. These must be used appropriately, refraining from using them for personal or non-professional purposes (unless expressly authorized) and/or for activities not directly related to the Institution's interests, protecting them against theft, loss, or misuse.

These assets and resources include: facilities, equipment, intellectual property (own or third-party), and financial resources, among others.

5.13. Measures Against Corruption

It is prohibited to offer, solicit, or accept bribes, payments, gifts, or favors to public officials to influence administrative decisions or obtain illegal advantages in contracts or subsidies.

Any public subsidy or contract received by the Foundation must be managed transparently.

The Foundation will participate in tenders and bids while respecting the principles of fair competition and transparency.

The criteria for selecting suppliers or collaborators in private tenders must be objective, free from external influences.

It is not permitted to offer bribes or favors to representatives of private companies to influence their decisions in tender processes.

PAS, PDI, and any other person associated with the university must not solicit, accept, or offer gifts, favors, or benefits that could affect their professional impartiality or be interpreted as an attempt to exert influence.

Only courtesy gifts of symbolic or promotional value (e.g., institutional or promotional materials) are permitted. If a gift exceeds a reasonable value (e.g., 100 euros), it must be received on behalf of the university and not personally.

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5.14. Respect for Free Competition and Market Behavior

The Foundation commits to being honest and transparent in its advertising practices, avoiding the publication of misleading information or content that could distort the perception of consumers or stakeholders. It will not promote campaigns that discredit or harm other entities.

The Foundation will never enter into written or verbal agreements or alliances with competitors to fix prices, coordinate bids, or engage in any other activity that violates applicable antitrust or free competition laws.

5.15. Environmental Protection

The Institution commits to implementing the best environmental practices in all its activities by preventing and minimizing adverse environmental impacts and conserving natural resources. *The Institution's internal environmental regulations must be adhered to.*

5.16. Licenses, Authorizations, Concessions, and Permits Required for Operations

Blanquerna will maintain all necessary licenses, authorizations, concessions, permits, and liability insurance required for its operations.

5.17. Public Treasury and Social Security

The Foundation commits to fulfilling its tax and Social Security obligations. All tax-relevant facts must be included in its declarations. Any conduct aimed at evading tax obligations or improperly obtaining benefits to the detriment of national, regional, or local public treasuries or Social Security is prohibited.

The Institution commits to accuracy in applying for public subsidies and using them for the purposes for which they were granted.

5.18. Accurate Records

Academic and commercial records, contracts, and all documents, whether in paper or electronic format, generated during the course of activities must be as accurate as possible and directly and fully reflect the facts. Any falsification, omission, alteration, or concealment of information is strictly prohibited.

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Likewise, the Institution's accounting records must reflect all components of transactions and financial events with maximum accuracy.

All transactions must be duly authorized, executed, and recorded both documentarily and accounting-wise in accordance with current legal provisions and must be related to the Institution's activities.

5.19. Prevention of Money Laundering, Terrorism, and Smuggling

The Foundation will ensure that its activities do not facilitate irregular payments, smuggling, or money laundering originating from illicit or criminal activities. Under no circumstances will cash payments exceeding 1,000 euros be accepted.

5.20. Donations and Social Impact Projects

All donations will be managed transparently, ensuring that funds are allocated to their intended purposes.

The Foundation commits to promoting projects that contribute to social, cultural, and educational development, executed in a sustainable manner.

6. REGULATORY COMPLIANCE COMMITTEE

The Regulatory Compliance Committee is the body designated by the Board of Trustees to address any doubts that may arise regarding this Code of Conduct and the internal regulations governing the behavior of the Institution's members.

It will exercise its functions with autonomous powers of initiative and control.

7. COMMUNICATION CHANNEL (CONDUCT CHANNEL)

Blanquerna provides members of the Board of Trustees, directors, teaching and research staff (PDI), and administrative and service staff (PAS) with an email address where they can raise questions and queries regarding this Code. Additionally, in compliance with current legislation, a conduct channel is available for reporting violations or serious breaches of the Code and other significant infractions.

7.1. Queries Regarding the Interpretation of the Code of Conduct

The Regulatory Compliance Committee will respond to queries or doubts raised by Blanquerna's directors and employees regarding the interpretation of this Code through the following email:

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canalconducta@blanquerna.url.edu

7.2. Reporting a Potential Violation or Breach of the Code of Conduct

Blanquerna provides members of the Board of Trustees, directors, PDI, and PAS with an internal communication channel (conduct channel) within the SCALA Portal, where they can report illicit behaviors, irregularities, or serious breaches of which they become aware to the Regulatory Compliance Committee.

Reports can be submitted through the following platform:

<https://fundacioblanquerna.complianceribavidal.com>

Blanquerna will ensure, through the actions of the Regulatory Compliance Committee as the entity responsible for the internal conduct channel system, the integrity and confidentiality of the information, impartiality in reviewing the information received, and will not tolerate any form of retaliation against employees who, in good faith, report alleged breaches.

If a report is made in bad faith, with knowledge of its falsehood, or with reckless disregard for the truth, the person responsible will face disciplinary sanctions, without prejudice to any criminal or civil liabilities that may arise from making false accusations.

8. ACCEPTANCE AND COMPLIANCE WITH THE CODE

The Foundation will communicate and disseminate the content of this Code to members of the Board of Trustees, directors, PDI, and PAS, who have a duty to respect and promote compliance with it.

Likewise, Blanquerna will provide a copy of this Code to new employees and require them to sign their acceptance of it.

9. DISCIPLINARY SANCTIONS FOR BREACH OF THE CODE OF CONDUCT

Non-compliance with this Code constitutes a breach of contractual good faith and will result in the imposition of appropriate legal and disciplinary measures, in accordance with the Workers' Statute, applicable legal regulations, and the current collective bargaining agreement.

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9.1. Employees with Labor Contracts

Non-compliance with the Code or measures adopted by the Institution within the framework of its crime prevention policy, when committed by a director or employee with a labor contract, will be sanctioned according to the scale of offenses and penalties established in the applicable legal provisions and collective bargaining agreement.

9.2. Commercial Relationships

Non-compliance with the Code or measures adopted by the Institution within the framework of its crime prevention policy, in the case of commercial relationships, will result in the termination of the contract, without prejudice to any claims for damages that may apply.

Disciplinary sanctions will be applied both to those who violate this Code and to those who, by action or omission, approve such behaviors or are aware of these violations and fail to address them immediately.

10. VALIDITY AND MODIFICATION OF THE CODE OF CONDUCT

This Code takes effect upon its approval by the Institution's Governing Body and will remain in force until the Governing Body updates, revises, or repeals it.